



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

October 11, 2013

By Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2013 ETC Annual Report of Reservation Telephone Cooperative
Study Area Code 381632**

Dear Ms. Dortch:

On behalf of Reservation Telephone Cooperative “Reservation”, JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Reservation seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	381632
<015> Study Area Name	RESERVATION TEL COOP
<020> Program Year	2014
<030> Contact Name: Person USAC should contact with questions about this data	Shane Hart
<035> Contact Telephone Number: Number of the person identified in data line <030>	7018623115
<039> Contact Email Address: Email of the person identified in data line <030>	shaneh@restel.com

ANNUAL REPORTING FOR ALL CARRIERS			54.313 Completion Required	54.422 Completion Required
(check box when complete)				
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report				
<300> Unfulfilled Service Requests (voice)	92	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<310> Detail on Attempts (voice)	381632nd310 (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<320> Unfulfilled Service Requests (broadband)		<input type="checkbox"/>	<input type="checkbox"/>	
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<410> Fixed	0.0			
<420> Mobile				
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>	
<440> Fixed				
<450> Mobile				
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<510> 381632nd510	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<610> 381632nd610	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>	
<1010> <input type="checkbox"/>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>	
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>	
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>	
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets
 <114> Report how much universal service (USF) support was received
 <115> How (USF) was used to improve service quality
 <116> How (USF) was used to improve service coverage
 <117> How (USF) was used to improve service capacity
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

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FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<701>	Residential Local Service Charge Effective Date	1/1/2013
<702>	Single State-wide Residential Local Service Charge	

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(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986 / OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
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<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

[illegible]

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OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com
<810>	Reporting Carrier	Reservation Telephone Cooperative
<811>	Holding Company	
<812>	Operating Company	

[illegible]

(900) Tribal Lands Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
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<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<910> Tribal Land(s) on which ETC Serves Fort Berthold Indian Reservation

<920> Tribal Government Engagement Obligation

381632nd920

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes,No, NA)
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381632
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<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	381632
<015>	Study Area Name	RESERVATION TEL COOP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Shane Hart
<035>	Contact Telephone Number - Number of person identified in data line <030>	7018623115
<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of attached document (.pdf)

<1220> Link to Public Website

HTTP <http://www.reservation-telephone.com/phone/lifeline/>

"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	381632
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<039>	Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Certification
- <2013> 2014 Frozen Support Certification
- <2014> 2015 Frozen Support Certification
- <2015> 2016 and future Frozen Support Certification

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016> Certification Support Used to Build Broadband

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Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached PDF , on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

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(3000) Rate Of Return Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan

<p>(3010) Milestone Certification {47 CFR § 54.313(f)(1)(i)} Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.</p>	<p>Name of Attached Document Listing Required Information</p>	<input type="checkbox"/>
<p>(3012) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)} (3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (3014) If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:</p>	<p>Name of Attached Document Listing Required Information</p>	<input checked="" type="checkbox"/> (Yes/No) <input checked="" type="checkbox"/> (Yes/No)
<p>(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)</p>		<input checked="" type="checkbox"/>
<p>(3016) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>		<input checked="" type="checkbox"/>
<p>(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation</p>	<p>Name of Attached Document Listing Required Information</p>	<p>381632nd3017</p>
<p>(3018) If the response is no on line 3014, Is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains :</p>		<input type="checkbox"/> (Yes/No)
<p>(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications</p>		<input type="checkbox"/>
<p>(3020) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>		<input type="checkbox"/>
<p>(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,</p>		<input type="checkbox"/>
<p>(3022) Underlying information subjected to a review by an independent certified public accountant</p>		<input type="checkbox"/>
<p>(3023) Underlying information subjected to an officer certification.</p>		<input type="checkbox"/>
<p>(3024) PDF of Balance Sheet, Income Statement and Statement of Cash Flows</p>		<input type="checkbox"/>
<p>(3025) Attach the worksheet listing required information</p>	<p>Name of Attached Document Listing Required Information</p>	

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	381632
<015> Study Area Name	RESERVATION TEL COOP
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<035> Contact Telephone Number - Number of person identified in data line <030>	7018623115
<039> Contact Email Address - Email Address of person identified in data line <030>	shaneh@restel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	RESERVATION TEL COOP
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 10/14/2013
Printed name of Authorized Officer:	Shane Hart
Title or position of Authorized Officer:	Assistant GM
Telephone number of Authorized Officer:	701.862.3115
Study Area Code of Reporting Carrier:	381632 Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	RESERVATION TEL COOP
Name of Authorized Agent or Employee of Agent:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 10/14/2013
Printed name of Authorized Agent or Employee of Agent:	Cassandra Heyne
Title or position of Authorized Agent or Employee of Agent:	Senior Analyst
Telephone number of Authorized Agent or Employee of Agent:	3014597590
Study Area Code of Reporting Carrier:	381632 Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED - FOR PUBLIC INSPECTION

Reservation Telephone Cooperative	381632	Unfulfilled Service Requests as of 12/31/12
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- [illegible]

REDACTED - FOR PUBLIC INSPECTION

[illegible]

REDACTED - FOR PUBLIC INSPECTION

- Sub 68 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 69 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 70 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 71 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 72 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 73 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 74 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 75 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 76 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 77 Service requested at brand new location and we had to obtain easements, fiber had to be engineered, plowed, spliced and cutover.
- Sub 78 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 79 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 80 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 81 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 82 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 83 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 84 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 85 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 86 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 87 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 88 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 89 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 90 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 91 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.
- Sub 92 New service request and due to time constraints, winter weather, and scheduling this was not installed as of 12/31/12.

Reservation Telephone Cooperative's (RTC's) Demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

RTC (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under federal law and, to a limited extent under North Dakota state law as a telecommunications carrier subject to North Dakota Public Service Commission regulation. These obligations include, but are not limited to, the following: (1) adherence to state requirements that the Company complies with consumer protection and service quality standards pursuant to North Dakota Administrative Code Article 69, including customer requests for lowest price service alternatives (69-09-05-01),

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

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discontinuance of telecommunications services (69-09-05-02), deposits and guarantees (69-09-05-03); (2) truth-in-billing requirements, and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

1. Ability to Function in Emergency Situations

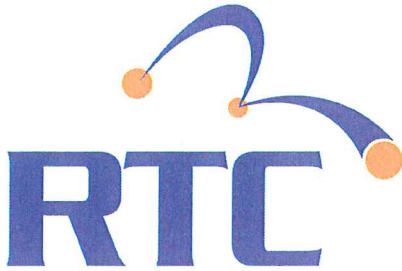
Reservation Telephone Cooperative (RTC) hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)¹ and North Dakota Administrative Code 69-09-05-12. The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow RTC to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. RTC's central office can maintain 8 hours, plus or minus 15 percent, of battery reserve rated for peak traffic load requirements, and a permanent auxiliary power unit is installed. RTC has battery backup at all office locations and in its electronic equipment sites capable of running for a minimum of 8 hours, plus or minus 15 percent. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

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continue to run as long as RTC has access to fuel. RTC tests the batteries at least once per year.



December 19, 2012

Tex Hall, Chairman
Three Affiliated Tribes of Mandan, Hidatsa and Arikara Nation
404 Frontage Road
New Town, ND 58763-9404

Dear Chairman Hall:

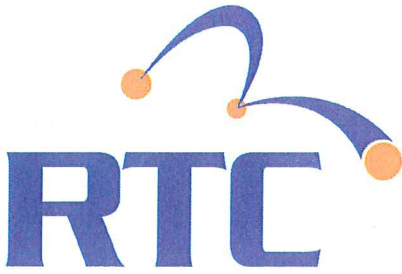
Reservation Telephone Cooperative ("RTC"), your independent telecommunications provider serving over 7,000 customers throughout 20 exchanges in Northwestern North Dakota wishes to engage with the Three Affiliated Tribes of the Fort Berthold Reservation about potential opportunities for broadband expansion on Tribally-owned lands within our service area. RTC wishes to build upon our existing relationship with the Three Affiliated Tribes to ensure that the telecommunications needs of your community are met by our company. Finally, RTC wishes to confirm with the Tribal Council that the company has consistently and earnestly engaged with officials, residents and businesses of the Fort Berthold Reservation in 2012 on matters related to broadband expansion on Tribal lands.

In November 2011, the Federal Communications Commission ("FCC") comprehensively reformed the Universal Service Fund ("USF") which helps companies like RTC provide state-of-the-art communications services in high-cost and rural areas. Among the reforms, the FCC adopted a rule requiring Eligible Telecommunications Carriers who receive high-cost USF support to engage with Tribal leaders about broadband deployment on Tribally-owned lands and report annually on five specific outreach activities. In July 2012, the FCC's Office of Native Affairs Policy ("ONAP") issued specific guidance on outreach and engagement activities between telecommunications providers and Tribal governments. These initial outreach and engagement activities must take place by the end of 2012, and efforts must continue in future years.

RTC has a long history of dedicated involvement with the Fort Berthold Reservation. RTC has been providing voice telephone service to residents and businesses on the Fort Berthold Reservation since 1951. Approximately 85% of residents have access to high speed internet at speeds of up to 6/1 Mbps. RTC is also in the process of upgrading to a fiber-to-the-home (FTTH) broadband network. Some Fort Berthold customers are already on the fiber network and others will be upgraded to the fiber network soon. Once the fiber network is complete, 100% of residents will have access to high speed internet with nearly limitless speeds. With FTTH, customers can use, participate in, and enjoy broadband-enabled applications such as distance learning and healthcare, streaming HD video, and much more.

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CEO/General Manager

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As of November, 2012, the FTTH project on the Fort Berthold Reservation is 75% complete, and the company expects to be 100% complete in 2015. RTC also received \$21.9M in stimulus funds from the American Recovery and Reinvestment Act in 2010 to expand broadband on the Fort Berthold Reservation, and we wish to work with you to ensure that these funds are used in ways where your community derives the greatest benefit.

In addition to providing state-of-the-art telecommunications services to the Fort Berthold Reservation, RTC actively supports the community through donations and sponsorships. Some of RTC's contributions and community involvement include: local Head Start programs, the Parshall Resource Center, Tribal Social Services, Red Sage and the Annual Four Bears Benefit Swim, Elders groups, employee appreciation and Christmas parties for tribal employers, among many other things. Thanks to our partnership with BEK Sports we've been able to televise the Little Shell Powwow, Tribal Energy Summit, and high school sporting events on the reservation.

Given our pre-existing relationship and that RTC and the leaders of the Fort Berthold Reservation have been actively engaged about broadband deployment for years, we believe that complying with the FCC's Tribal engagement obligations for 2012 will be straight-forward for both parties and the requirements can be satisfied by a meeting to review what our company has done on the Fort Berthold Reservation in 2012 and what needs you may have going forward.

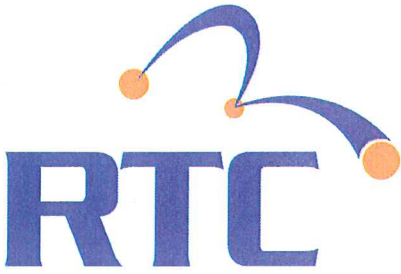
As explained above, RTC is now required to report to the FCC annually on Tribal Outreach activities, and RTC seeks your concurrence that the company considered the following items during interactions with the Tribal government in 2012. Specific examples are provided for each item.

1. Needs assessment and deployment planning focused on anchor institutions:

- The Fort Berthold Community College was cut-over to RTC's fiber optic network this year and recently increased their internet capacity thanks to the fiber.
- RTC provides broadband to the following anchor institutions: Three Affiliated Tribes Administration Building, numerous other tribal offices and programs, White Shield School, New Town Public Schools, Parshall Public Schools, Fort Berthold Community College, Parshall Public Library, New Town Public Library, Elbowoods Memorial Healthcare Center, Minne-Tohe Clinic, Trinity Community Clinic in New Town, Parshall Medical Center, Northeast Segment Health Center, White Shield Clinic, Mandaree Field Clinic, Three Affiliated Tribes Fire Management Program, New Town Fire Department, Parshall Fire Department, New Town ambulance squad, Parshall ambulance squad, Three Affiliated Tribes Police Department, New Town Police Department, and Fort Berthold Rural Water.

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Looking forward, RTC is committed to working with the Three Affiliated Tribes to ensure that state-of-the-art broadband services are provided to schools, libraries, health care centers, and Tribal government offices. We are available and willing to discuss options for building or upgrading broadband networks at any of your community's anchor institutions. Additionally, we are interested in learning if residents and businesses on the Fort Berthold Reservation have needs for any of the other services our company provides, such as high definition surveillance cameras, phone systems, TV service, and specialized circuits and internet connections.

2. Feasibility and sustainability planning:

RTC evaluates potential broadband projects on a number of factors, including whether the project is technically and financially feasible and whether there is an opportunity for a return on investment. RTC is committed to providing broadband to all customers within our service area, which includes a large portion of the Fort Berthold Reservation. RTC is using stimulus funding specifically to improve broadband access on the Fort Berthold Reservation, which increases both the feasibility and sustainability of broadband projects.

In 2013, RTC is interested in collaborating with the Three Affiliated Tribes to develop feasibility and sustainability plans; and discuss opportunities and challenges associated with any potential broadband build-out and upgrade projects.

3. Marketing Services in a Culturally Sensitive Manner

RTC has consistently recognized and respected any cultural attributes of the Three Affiliated Tribes in our marketing efforts and when we communicate with the Tribal council. RTC is interested in learning about ways in which we can be more in-tune with your culture and heritage. RTC invites members of the Three Affiliated Tribes to keep us informed about cultural events in the community, and we are willing to work with members of the Three Affiliated Tribes to develop marketing materials tailored to your needs. RTC has always employed tribal members and we currently employ 10 tribal members. Both of our customer service locations are located on Fort Berthold. RTC is headquartered in Parshall and we recently opened a second office in New Town.

4. Rights of Way and Other Permitting and Review Processes

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As RTC has been providing service on the Fort Berthold Reservation for 61 years, we are well familiarized with your rights of way and land use permitting processes. In 2012, RTC hired Dakota Land Services to help with coordinating easements, as the scope of our project was too large for our in-house easement team.



RTC wishes to stay informed about your rights of way and land use permitting processes so that potential broadband projects can move forward quickly and efficiently, where your community receives the greatest benefit. RTC would like for you to provide a current list of all pertinent rights of way, land use, easement, zoning, and permitting processes that the company would need to comply with in any broadband construction projects in 2013. Please also inform us how any of these processes can be expedited.

5. Compliance with Tribal Business and Licensing Requirements

RTC is also well familiarized with your Tribal business and licensing requirements, and responds to them as requested.

Looking ahead to 2013, RTC is committed to maintaining a strong relationship and a high level of engagement with the Three Affiliated Tribes. We are interested in working together to develop plans to provide service to new construction sites and residential developments affiliated with the newly planned oil refinery on the reservation. We hope that RTC and the Three Affiliated Tribes will collaborate on new ways to bring economic development to the Fort Berthold Reservation by ensuring that residents and businesses have advanced telecommunications and broadband services.

RTC looks forward to a new year of productive and mutually-beneficial engagement with the Three Affiliated Tribes.

Sincerely,

Royce S. Aslakson
CEO/General Manager

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CEO/General Manager

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I, Tex Hall, Chairman of the Three Affiliated Tribes of the Fort Berthold Reservation, certify that the information in this letter is accurate. Reservation Telephone Cooperative met the Federal Communications Commission's criteria for Tribal engagement with the Three Affiliated Tribes in the calendar year 2012.

Signed: Tex Hall

Date: 5-9-13

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RESERVATION TELEPHONE COOPERATIVE (SAC 381632)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY